

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF PENNSYLVANIA**

In re	:	
	:	CHAPTER 13
ROBERT W STEINBERG	:	
	:	
Debtor(s)	:	No. 17-15690 mdc

DEBTOR'S RESPONSE TO THE MOTION OF WELLS FARGO BANK, N.A., d/b/a

WELLS FARGO AUTO, FOR RELIEF FROM THE AUTOMATIC STAY

COMES NOW, Robert W Steinberg, Debtor and Respondent, through counsel of record, Michele Perez Capilato, Esquire, and submits the following in response to the Motion for Relief from the Automatic Stay filed herein:

1-10. DENIED. The averments contained in these Paragraphs consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

11-12. Debtor acknowledges he fell behind with post-petition auto loan payments due to lost income resulting from the current pandemic. However, Debtor believes he is now fully current with all post-petition payments and has provided payment receipts to Movant.

13-14. DENIED. The averments contained in these Paragraphs consist of mischaracterization or summarization of documents that speak for themselves and they are denied as no response is required.

For the reasons set forth above, among others, and based on this Court's authority under the Bankruptcy Code, the Debtor prays that the motion be denied, and such other relief as is just and proper. The Debtor specifically reserves the right to supplement the answer at or prior to the hearing thereon.

August 18, 2020

Respectfully submitted,

Law Offices of Michele Perez Capilato

By: /s/ Michele Perez Capilato

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